

REMARKS

Reconsideration of the present application, as amended, is respectfully requested.

In the Office Action, claims 1-3, 5, 7-11, 13-14 and 16-17 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0011923 (Cunningham) in view of U.S. Patent No. 6,792,463 (Lamberton). Further, claims 4 and 15 were rejected under 35 U.S.C. §103(a) as being unpatentable over Cunningham in view of Lamberton and U.S. Patent No. 6,054,846 (Castleman). Claims 6 and 12 were rejected under 35 U.S.C §103(a) as being unpatentable over Cunningham in view of Lamberton and U.S. Patent No. 6,281,784 (Redgate). In response, claims 5 and 11 have been canceled without prejudice independent claims 1, 7, 13 and 16-17 have been amended for clarification. Applicant respectfully submits that claims 1-4, 6-10 and 12-17 are patentable over Cunningham, Lamberton, Castleman and Redgate for at least the following reasons.

Cunningham is directed to an appliance communication and control system where intelligent appliances are coupled by common household power lines or wireless links. At least one of the

appliances serves as a system controller. As correctly noted by the Examiner, Cunningham does not teach or suggest a module that adopts the identity information from the appliance, as recited in independent claims 1, 7, 13 and 16-17. Column 3, lines 45-49 of Lamberton is cited in an attempt to remedy this deficiency in Cunningham.

Lamberton is directed to a system for providing invisibility to a proxy-server. Column 3, lines 45-49 of Lamberton recite a technique in which a device mimics the IP address of another party, referred to as 'spoofing' to preserve transparency to improve the behavior of the network.

It is respectfully submitted that Lamberton and Cunningham are not related and there is no motivation or suggestion for any such combination. Assuming, arguendo, that such a combination is proper, it is respectfully submitted that such a combination still does not teach or suggest the present invention as recited in independent claims 1, 7, 13 and 16-17, that amongst other patentable elements, claim 1 recites the following, with similar recitations in independent claims 7, 13 and 16-17 (illustrative emphasis provided):

the module adopting the identity information from the appliance so that the appliance is rendered controllable through a module identifier of the module and through the identity information from the appliance and assumed by the module.

The 'spoofing' recited Lamberton is "to preserve transparency to improve the behavior of the network." (Column 3, lines 47-48)

Further, in the Office Action, paragraphs 119-121 of Cunningham are cited in rejecting claims 5 and 11 to show that the appliance is rendered controllable through a module identifier of the module and through the identity information from the appliance and assumed by the module. It is respectfully submitted that the cited section of Cunningham merely teaches communication between a wireless bridge device 70 and other devices, such as a scale 72, a smoke detector 74 and blood pressure monitor 76. RF or IR may be used for the wireless communication, where if "the bridge 70 detects that the selected channel has become unacceptable (e.g., due to noise), it will rescan and select a new channel." (Paragraph [0121], next to last sentence)

A module adopting the identity information from the appliance so that the appliance is rendered controllable through a module identifier of the module and through the identity information from

the appliance and assumed by the module, as recited in independent claims 1, 7, 13 and 16-17, is nowhere taught or suggested in Cunningham, Lamberton, Castleman, Redgate and combinations thereof. This provides substantial benefits such as providing an extra degree of freedom in control, as recited on page 5, lines 21-27.

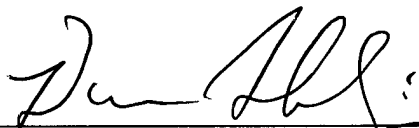
Accordingly, it is respectfully submitted that independent claims 1, 7, 13 and 16-17, are allowable, and allowance thereof is respectfully requested. In addition, it is respectfully submitted that claims 2-4, 6, 8-10 and 14-15 should also be allowed at least based on their dependence from independent claims 1, 7 and 13.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

It is believed that no additional fees or charges are currently due. However, in the event that any additional fees or

charges are required for entrance of the accompanying amendment, they may be charged to applicant's representatives Deposit Account No. 50-3649. In addition, please credit any overpayments related to any fees paid in connection with the accompanying amendment to Deposit Account No. 50-3649. In view of the above, it is respectfully submitted that the present application is in condition for allowance, and a Notice of Allowance is earnestly solicited.

Respectfully submitted,

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